



May 27, 2008

Honorable Edward S. Marion, Administrative Law Judge  
Public Service Commission  
P.O. Box 7854  
Madison, WI 53707-7854

**OFFICIAL FILING**  
**SUBMITTED ELECTRONICALLY**

Dear Judge Marion:

Enclosed is the Wisconsin's Paper Council's motion requesting full party intervenor status in Public Service Commission Docket 5-UI-115, captioned "Investigation into the Adoption and Achievement of Increased Conservation and Energy Efficiency Goals."

Sincerely,

*Earl Gustafson*

Earl Gustafson  
VP – Energy, Forestry & Human Resources

ejg

Enc.

BEFORE THE  
PUBLIC SERVICE COMMISSION  
OF WISCONSIN

Investigation into the Adoption and Achievement of Increased Conservation and Energy Efficiency Goals	] ]	5-UI-115
--	--------	----------

Motion to Intervene  
By The  
Wisconsin Paper Council

The Wisconsin Paper Council moves to intervene as a full party in the above-captioned matter.

Service of Documents and Pleadings

Service of all subsequent documents and pleadings in this case should be submitted to:

Mr. Earl J. Gustafson  
VP – Energy, Forestry & Human Resources  
Wisconsin Paper Council  
P.O. Box 718  
250 North Green Bay Road (54956-2245)  
Neenah, Wisconsin 54957-0718

Telephone: 920-722-1500  
Facsimile: 920-722-7541  
E-Mail: [gustafson@wipapercouncil.org](mailto:gustafson@wipapercouncil.org)

Interest of the Wisconsin Paper Council

- I. The Wisconsin Paper Council (WPC) is the trade association representing the pulp, paper and allied industry in the state. The WPC has been in existence for more than 57 years.
- II. The WPC is comprised of Regular members that are manufacturers of pulp, paper and paperboard products and Associate members supplying goods and services to the industry.

- III. All of the WPC's Regular and Associate members purchase retail electricity from regulated utilities in Wisconsin.
- IV. The paper industry purchases approximately 16.5 trillion British thermal units (BTU) of electricity annually. Individual paper companies purchase \$3.5 million to more than \$12.0 million of electricity annually. Electricity accounts for 15 percent to 20 percent of the average pulp and paper manufacturer's energy needs.
- V. The Wisconsin Public Service Commission's Notice of Investigation states that in this investigation it may consider, among other issues:
  - \* Conservation and energy efficiency goals to be adopted.
  - \* Appropriate funding level to achieve the goals.
  - \* Portfolio of approaches to achieve the goals.
  - \* Broadening the existing energy efficiency potential study.
- VI. The WPSC's Notice of Investigation may reasonably be interpreted to indicate that the costs of retail electricity purchased by the WPC's Regular and Associate members may be affected by this proceeding.
- VII. The WPSC's Notice of Investigation also may reasonably be interpreted to indicate that some of the energy conservation and efficiency programs presently available to the WPC's Regular and Associate members may be affected by this proceeding.
- VIII. The intervention and participation of the WPC will be in the public interest.
- IX. The WPC is not now, and will not be, adequately represented by any other party in this proceeding.

Therefore, pursuant to §227.44(2m), Wisconsin Statutes, and Chapter PSC 2.21(1), Wisconsin Administrative Rules, the Wisconsin Paper Council respectfully requests full-party intervenor status in the aforementioned proceeding as our direct and substantial interests, and those of our members, will be affected by any decision by the Public Service Commission.

Dated this 27<sup>th</sup> day of May, 2008.

Earl J. Gustafson

Earl J. Gustafson  
VP – Energy, Forestry & Human Resources  
Wisconsin Paper Council